

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DEC 14 2016

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROGERICK AMOS,  
JEREMIAH KNIGHTEN, and  
STEVEN BAYNHAM,

Defendants.

No.

4:16CR526 HEA/JMB

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning on an unknown date and continuing for a time period, including July 2016 through October 2016 with the exact dates unknown, within the Eastern District of Missouri, and elsewhere,

**ROGERICK AMOS,  
JEREMIAH KNIGHTEN, and  
STEVEN BAYNHAM,**

the defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree together with one or more other persons known and unknown to the Grand Jury, to commit the following offenses against the United States: to distribute and possess, with the intent to distribute, a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 846, and punishable under Title 21, United States Code, Section 841(a)(1)(C).

**COUNT II**

The Grand Jury further charges that:

On or about July 26, 2016, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**STEVEN BAYNHAM,**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT III**

The Grand Jury further charges that:

On or about July 28, 2016, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**STEVEN BAYNHAM,**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT IV**

The Grand Jury further charges that:

On or about August 3, 2016, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**ROGERICK AMOS,**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT V**

The Grand Jury further charges that:

On or about August 8, 2016, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**JEREMIAH KNIGHTEN,**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT VI**

The Grand Jury further charges that:

On or about August 25, 2016, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**ROGERICK AMOS,**

the defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT VII**

The Grand Jury further charges that:

On or about August 25, 2016, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**ROGERICK AMOS,**

the defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT VIII**

The Grand Jury further charges that:

On or about October 12, 2016, in the County of St. Louis, Missouri, within the Eastern District of Missouri,

**STEVEN BAYNHAM,**

the defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
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